

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ROBERT B. LOVE, M.D.,

Plaintiff,

Case No.: 15-CV-650-LA

v.

MEDICAL COLLEGE OF WISCONSIN, INC.,
FROEDTERT MEMORIAL LUTHERAN
HOSPITAL, INC., ALFRED C. NICOLosi,
M.D., PAUL S. PAGEL, M.D., DAVID C.
WARLTIER, M.D., and LARRY
LINDENBAUM, M.D.,

Defendants.

DECLARATION OF JILL M. MUNSON

JILL M. MUNSON declares as follows under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an adult resident of the State of Wisconsin, an attorney licensed to practice in the State of Wisconsin, admitted to practice in the United States District Court – Eastern District of Wisconsin, and appearing as one of the attorneys of record for the Medical College of Wisconsin (MCW) Defendants in the above-captioned action. I make this declaration based upon personal knowledge of the facts and circumstances attested to herein in support of the MCW Defendants' brief in opposition to Plaintiff's Rule 7(h) Motion to Quash.

2. The reference to "a.m." in the "1:30 a.m." production time listed in the subpoena duces tecum issued to Lawton & Cates, S.C. is a typographical error. The intended production time was 1:30 p.m.

3. I did not catch the error when I signed the subpoena. However, I caught the error when I later reviewed the subpoena.

4. On January 2, 2018, I called and spoke to Dixon Gahnz, the president of Lawton & Cates and person to whom the subpoena was directed, to explain the error. I also explained the MCW Defendants' grounds for seeking the file and gave my direct telephone number so he could reach me to try to work out production of the file and avoid the need for him to travel to Milwaukee for the document production. This discussion took place before the subject motion to quash was filed.

Dated this 9th day of January, 2018

/s/ Jill M. Munson

Jill M. Munson

State Bar No. 1019540